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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
SUSANNE MARIE CARROLL	§	CASE NO. 17-42077-btr-13
	§	
Debtor	§	CHAPTER 13

MOTION FOR CONTINUATION OF AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW BEFORE THE COURT, Debtor Susanne Marie Carroll and files this her Motion for Continuation of Automatic Stay, and would respectfully show the Court the following:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b). This Motion is additionally filed in accordance with 11 U.S.C. §362 (c)(3)(B).

2. Debtor filed the current voluntary petition for relief under Chapter 13 of Title 11 of the United States Code on 9/22/2017.

3. Debtor had previously filed a voluntary Petition for relief under Chapter 13 of the United States Code bearing the case number 12-42473-13. That case was filed on 9/7/2012, and was dismissed without prejudice on 8/23/2017.

4. Debtor's previous case was subsequently dismissed for failure to pay the Trustee that

resulted from Debtor's retirement and decreased income and at the time had increased expenses that resulted in Debtor being unable to maintain household expenses and Trustee payments..

5. A Motion for Relief was filed on behalf of Liberty National Bank, by Don Biard, Esq., 38 1st NW, Paris, TX 75460.

6. A Notice of Appearance was filed by Laurie Spindler Huffman, Esq., 2 on behalf of Lamar CAD, 2777 N. Stemmons Freeway, Suite 1000, Dallas, TX 75207; A Request for Service of Notices was filed by Ramesh Singh, Recovery Management Systems Corp, 25SE 2nd Avenue, Suite 1120, Miami, FL 33131-1605..

7. Debtor believes her financial situation will substantially improve, enabling her to complete her proposed Preliminary Chapter 13 Plan. Debtor has now been able to pay off bills and decrease ongoing expenses, and her husband's job has also stabilized with a resultant increase in income.

8. Debtor will show the Court her current case was not filed with the intent to hinder, delay or defraud her creditors.

9. Debtor understands her obligations specified under Chapter 13 Bankruptcy relief and will show the Court her financial ability to complete her proposed Plan.

WHEREFORE, PREMISES CONSIDERED, Debtor Susanne Marie Carroll respectfully requests this Court grant her request for continuance of the automatic stay concerning all scheduled creditors; and for any other relief in both law and equity as the Court may deem appropriate.

DATED: September 27, 2017

Respectfully Submitted,

LEINART LAW FIRM

By: /s/ Marcus Leinart

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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2017, I did serve a true and correct copy of the foregoing to the following interested parties and to those listed on the matrix as filed with the Court, by United States Mail, First Class;

Susanne Marie Carroll
2140 E Polk Street
Paris, TX 75460

Office of the Standing Chapter 13 Trustee
Carey D. Ebert - Via ECF
500 N. Central Expressway, Suite 350
Plano, TX 75074

United States Trustee
110 N. College Ave, Ste 300
Tyler, TX 75702

/s/ Marcus Leinart
Marcus Leinart
Attorney for Debtor

Label Matrix for local noticing 0540-4 Case 17-42077 Eastern District of Texas Sherman Wed Sep 27 14:13:16 CDT 2017	AT&T Mobility II LLC % AT&T Services, Inc James Grudus, Esq. One AT&T Way, Room 3A218 Bedminster, NJ 07921-2693	Account Recovery Svcs 3144 Sw 28th Ave Ste A Amarillo, TX 79109-3169
Adkins Unitd 306 Clarksville St Paris, TX 75460-5932	Adkins United Finance 306 Clarksville Paris, TX 75460-5932	Alliance Finance Company 25 NE 20th Street Paris, TX 75460-4715
American InfoSource LP as agent for Midland Funding LLC PO Box 268941 Oklahoma City, OK 73126-8941	Attorney General of Texas Collections Div/ Bankruptcy Section PO Box 12548 Austin, TX 78711-2548	B & F Finance 221 N. Broadway Hugo, OK 74743-3859
Bay Area Credit PO Box 468449 Atlanta, GA 31146-8449	Burns & Carlisle PO Box 1460 Sulphur Springs, TX 75483-1460	Burns & Carlisle Inc 122 Lee St Sulphur Springs, TX 75482-4343
CCM Enterprises PO Box 781317 Wichita, KS 67278-1317	CIty Finance 1559 Clarksville St. Paris, TX 75460-6077	(p)CREDIT ACCEPTANCE CORPORATION 25505 WEST 12 MILE ROAD SOUTHFIELD MI 48034-8316
Carey D. Ebert 500 N. Central Expressway, Suite 350 Plano, TX 75074-6791	Carey D. Ebert P. O. Box 941166 Plano, TX 75094-1166	Susanne Marie Carroll 2140 E Polk Street Paris, TX 75460-7599
Cash Express 3365 Lamar Ave Paris, TX 75460-5023	Cash Max 147 N. Collegiate Dr. Paris, TX 75460-4842	Cash Store 3848 Lamar Ave. Paris, TX 75462-5205
City Finance 215 N Travis St Sherman, TX 75090-5922	Colortyme Loans 2060 Lamar Ave. Paris, TX 75460-4752	(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION PO BOX 13528 AUSTIN TX 78711-3528
Cottonwood Financial Texas, LP 1901 Gateway Drive Suite 200 Irving, TX 75038-2425	Cr England 4701 West 2100 Sou Salt Lake City, UT 84120	Credit Acceptance 25505 West Twelve Mile Rd Suite 3000 Southfield, MI 48034-8331
Credit Acceptance PO Box 513 Southfield, MI 48037-0513	EZ Loan Services 1455 Clarksville St Paris, TX 75460-6034	Edward Sloan & Associa PO Box 788 Winnsboro, TX 75494-0788

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c/o Don Biard
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Linebarger Goggan Blair & Sampson, LLP
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c/o Laurie Spindler Huffman
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Lamar County Tax Assessor-Collector
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Medical Claims And Col
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by American InfoSource LP as agent
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Houston, TX 77210-4457

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Noble Fin
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One Main Financial
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PRA Receivables Management, LLC
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Norfolk, VA 23541-1021

Plano - U. S. Bankruptcy Court
Suite 300B
660 North Central Expressway
Plano, TX 75074-6795

Portfolio Investments II LLC
c/o Recovery Management Systems Corporat
25 SE 2nd Avenue Suite 1120
Miami FL 33131-1605

Quantum3 Group LLC as agent for
Capio Partners LLC
PO Box 788
Kirkland, WA 98083-0788

Recovery Management Systems Corporation
25 S.E. 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Recovery Management Systems Corporation
25 S.E. Second Avenue
Suite 1120
Miami, FL 33131-1605

SECURITY FINANCE CENTRAL BANKRUPTCY
P O BOX 1893
SPARTANBURG SC 29304-1893

<p>SFC-Central Bankruptcy P.O. Box 1893 Spartanburg, S.C. 29304-1893</p>	<p>Case 17-42077 Doc 5 Filed 09/27/17 Entered 09/27/17 14:22:02 Desc Main Document Page 6 of 7 Sarma Coll 1801 Broadway St San Antonio, TX 78215-1227</p>	<p>Southwest Credit System 4120 International Parkway Suite 1100 Carrollton, TX 75007-1958</p>
<p>Southwestern Bell Telephone Company % AT&T Services, Inc James Grudus, Esq. One AT&T Way, Room 3A218 Bedminster, NJ 07921-2693</p>	<p>State of Texas HHS Employee Service Center PO Box 6629 Round Rock, TX 78683-6629</p>	<p>Statewidecol 3626 N. Western Oklahoma City, OK 73118-5660</p>
<p>Stephen G. Wilcox Wilcox Law, PLLC PO Box 11509 Fort Worth, TX 76110-0509</p>	<p>Sun Loan Company 111 N. Broadway Hugo, OK 74743-4030</p>	<p>Sunbelt Credit 201 N. Collegiate Paris, TX 75460-1494</p>
<p>Susanne M. Carroll 2140 E. Polk St. Paris, TX 75460-7599</p>	<p>Texas Alcoholic Beverage Commission Licenses and Permit Division PO Box 13127 Austin, TX 78711-3127</p>	<p>Texas Workforce Commission TEC Building- Bankruptcy 101 E 15th St Austin, TX 78778-0001</p>
<p>The Law Offices Of Mit 2222 Texoma Pkwy Ste 160 Sherman, TX 75090-2482</p>	<p>The Law Offices of Mitchell D. Bluhm 2222 Texoma Pkwy Ste 160 Sherman, TX 75090-2482</p>	<p>Tristram Coffin 555 Zang St. Lakewood, CO 80228-1010</p>
<p>U.S. Attorney General Department of Justice Main Justice Building 10th & Constitution Ave., NW Washington, DC 20530-0001</p>	<p>US Trustee Office of the U.S. Trustee 110 N. College Ave. Suite 300 Tyler, TX 75702-7231</p>	<p>United States Attorney General Dept. of Justice Main Justice Bldg 10 and Constitution, NW Washington, DC 20530-0001</p>
<p>United States Attorney's Office 110 North College Ave, Ste 700 Tyler, TX 75702-0204</p>	<p>United States Attorneys Office 110 North College Ave Ste 700 Tyler, Texas 75702-0204</p>	<p>United States Trustee's Office 110 North College Ave, Ste 300 Tyler, TX 75702-7231</p>
<p>United States Trustee- Eastern District 110 N. College Ave, Ste 300 Tyler, TX 75702-7231</p>	<p>Verichek PO Box 3218 Abilene, TX 79604-3218</p>	<p>Verizon Wireless Verizon Wireless Department/Attn: Bankru PO Box 3397 Bloomington, IL 61702-3397</p>
<p>Western Finance 1245 Clarksville St. Paris, TX 75460-6030</p>	<p>Western Shamrock Corporation Attention: Bankruptcy 801 S Abe St. San Angelo, TX 76903-6735</p>	

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346 |
| (d)PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021 | (u)Sun Loan Company | (d)U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave.,NW
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| (d)US Trustee
Office of the U.S. Trustee
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